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OFFICE OF GENERAL
COUNSEL

May 21, 2012

Jeff S. Jordan
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Response to Matter Under Review 6471

Dear Mr. Jordan:

I have received your letter of May 2, 2012 enclosing a complaint, denominated as MUR # 6471, forwarded to the Federal Election Commission by CREW, a self-professed "good government" organization.

I have carefully reviewed the complaint filed by CREW on or about April 26, 2012. From my review, this complaint simply reiterates the alleged "facts" initially submitted by CREW to the Federal Election Commission in its original complaint of May, 11, 2011. As a result, this response to your letter of May 2, 2012 must incorporate, by specific reference, my letters to your office on June 1, 2011, in connection with MUR # 6391, my letter of October 20, 2011, in connection with MUR # 6471, as well as my formal Motion to Dismiss of November 30, 2010.

For your information and in an effort to be completely responsive to the Federal Election Commission with respect to these matters, I wish to bring the following to your attention. Other than the drafting of my Motion and follow-on letters to your office, and my signature on the Year End 2010 Internal Revenue Service informational return for the Commission on Hope Growth & Opportunity (the return having been prepared by a Certified Public Accountant), I have had no contact with or provided any legal services to, nor received any compensation from, the Commission on Hope Growth & Opportunity since late December 2010. I would characterize the Commission on Hope Growth & Opportunity as an inactive client and I have no present reason to believe that I will provide them any additional legal services in the future. As a client, though in an inactive status, my work product for this entity continues to be covered by the Attorney-Client privilege.

Thank you for your consideration of this response and my explanation of limited knowledge of the current status of my inactive client, the Commission on Hope Growth & Opportunity.

Sincerely,


William B. Canfield III